

NICHOLAS MARCHI
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Attorneys for Defendant

UNITED STATES DISTRICT COURT
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROSA MARTINEZ RODRIGUEZ,

Defendant

Case No.4:21-CR-06022-SAB-3

UNOPPOSED MOTION FOR
COUNSEL TO APPEAR
TELEPHONICALLY AT PRE-TRIAL
CONFERENCE

Note: August 23, 2022 at 6:30 pm
(Without Argument)
Judge Bastian at Yakima

COMES now the Defendant, by and through her attorneys and requests this Court grant the defendant's request to allow her counsel, or coverage counsel to appear at the Pre-Trial Status Conference on August 24, 2022, via the telephone. This motion is based on the following statements of facts.

Statement of facts in support of Motion

1. The defendant is currently scheduled for a Pre-Trial Conference on August 24, 2022, at 11:00 am.
2. The defendant is requesting that counsel or coverage counsel be allowed to appear via telephone, as counsel will be in Seattle, Washington that day in trial.
3. The defendant has been advised of the request to appear telephonically and has agreed to the request. The government does not oppose this request.

1 4. I do not believe the Government will be prejudiced as the only pending motion is to
2 continue the trial which the defendant agrees. I would respectfully request that my
3 motion be granted.

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5 Dated this 19th day of August 2022.

6 Respectfully submitted,

7 *S/ Nicholas Marchi*
8 Nicholas Marchi, WSBA 19982
9 CARNEY & MARCHI
10 Attorneys for Defendant
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CERTIFICATE OF SERVICE

I certify that a copy of the Motion and Declaration was ECF and or faxed or and mailed first class, postage prepaid on 8/19/2022, to C. Baunsgaurd, Assistant United States Attorney, 402 E. Yakima Ave, Suite 210, Yakima, WA 98901 or P.O. Box 1494, Spokane, WA 99210 and to all codefendant's counsel of record

s/Nicholas Marchi
CARNEY & MARCHI, P.S.
Attorneys for Defendant